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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

April 26, 2013

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BY E-MAIL

The Honorable Jesse M. Furman United States District Court Southern District of New York 40 Foley Square, Room 2202 New York, New York 10007

Re: <u>United States</u> v. <u>Alimzhan Tokhtakhounov et al.</u>,

13 Cr. 268 (JMF)

Dear Judge Furman:

The Government writes regarding the bail conditions for defendant Molly Bloom. At the defendant's April 16, 2013 presentment in the Central District of California, the Court set bail conditions that included the following:

- a \$50,000 appearance bond with one co-signer;
- travel restricted to the Central District of California and the Southern District of New York; and
- the defendant to surrender all travel documents and make no new applications

As directed by the Court at the April 19, 2013 arraignment and initial conference, the Government has conferred with the defendant's counsel regarding an appropriate bail package for this District. The parties jointly propose the following bail conditions for the Court's consideration:

- a \$100,000 personal recognizance bond, co-signed by one financially responsible person by May 9, 2013;
- travel restricted to the Southern and Eastern Districts of New York, the Central, Northern, Southern, and Eastern Districts of California, and the District of Colorado, and all points in between for the purpose of travel;
- regular Pre-Trial supervision;
- the defendant to surrender all travel documents and make no new applications;
 and
- the defendant to have no contact with co-defendants (except in the presence of counsel).

The Government is of course available for a conference regarding this matter.

Respectfully submitted,

PREET BHARARA United States Attorney

By:

Joshua A. Naftalis / Harris M. Fischman Assistant United States Attorneys

(212) 637-2310 / 2305

James Walden, Esq. cc: Avi Weitzman, Esq.

SO ORDERED:

The Honorable Jesse M. Furman **United States District Court** April 26, 2013